



OHD 039128913

A45

The Dow Chemical Company
Midland, Michigan 48674

2030 DOW CENTER
March 26, 2007

Regional Administrator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3507

RECEIVED
APR 02 2007

Waste, Pollution Prevention Division
U.S. EPA - REGION 5

LETTER FROM CHIEF FINANCIAL OFFICER

Dear Sir or Madam:

I am the chief financial officer of The Dow Chemical Company, 2030 Dow Center, Midland, Michigan 48674. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified as specified in subpart H of 40 CFR parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and nonsudden accidental occurrences is being demonstrated through the financial test specified in subpart H of 40 CFR parts 264 and 265:

EPA ID#
REGION 5

NAME/ADDRESS

OHD039128913

The Dow Chemical Company
Hanging Rock Plant
Old 52 Highway
Ironton, OH 45638

Sudden Insurance = \$2,000,000
Nonsudden Insurance = \$6,000,000

The firm identified above guarantees, through the guarantee specified in subpart H of 40 CFR parts 264 and 265, liability coverage for both sudden and nonsudden accidental occurrences at the following facilities owned or operated by the following:

None.

The firm identified above is the direct or higher-tier parent corporation of the owner or operator.

1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care or liability coverage is demonstrated through the financial test specified in subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimate covered by the test are shown for each facility:

REGION 5

OHD039128913

The Dow Chemical Company
Hanging Rock Plant
Old 52 Highway
Ironton, OH 45638

Closure = \$168,743

2. The firm identified above guarantees, through the guarantee specified in subpart H of 40 CFR parts 264 and 265, the closure and post-closure care or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

None.

3. In States where EPA is not administering the financial requirements of subpart H of 40 CFR parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in subpart H or 40 CFR parts 264 and 265. The current closure or post-closure cost estimates covered by such a test are shown for each facility:

REGION 1

CT001159730 The Dow Chemical Company **Closure = \$173,960**
Allyn's Point
Route 12
Gales Ferry, CT 06335

NHD048724173 Hampshire Chemical Corporation **Corrective Action = \$1,300,000**
2 East Spit Brook Road
Nashua, NH 03060-5633

REGION 4

GAD045929643 The Dow Chemical Company **Corrective Action = \$4,045,656**
Dalton Plant
1468 Prosser Drive, SE
Dalton, GA 30720

REGION 5

MID000724724 The Dow Chemical Company **Closure = \$99,793,268**
MI Division/MI Plant **Post-Closure = \$2,360,300**
1261 Building
Midland, MI 48674

MID980617435 The Dow Chemical Company **Closure = \$7,026,207**
MI Division/Salzburg Plant **Post-Closure = \$1,517,565**
Salzburg & Waldo Roads
Midland, MI 48640

REGION 6

LAD008187080 The Dow Chemical Company **Closure = \$4,224,589**
Louisiana Division **Post-Closure = \$501,063**
PO Box 150 **Corrective Action = \$1,269,000**
Plaquemine, LA 70764

LAD020597597 Angus Chemical Company **Closure = \$118,469**
Sterlington Facility
PO Box 1325
Sterlington, LA 71280

TXD008092793	The Dow Chemical Company Texas Operations B-1226 Freeport, TX 77541	Closure = \$7,286,914 Post-Closure = \$6,773,826 Corrective Action = \$165,260,004
TXD096037932 Used Oil #A85819	Johann Haltermann Ltd. Dow Haltermann Houston Jacintoport Plant 16717 Jacintoport Boulevard Houston, TX 77015	Closure = \$292,575
TXD00017756	The Dow Chemical Company La Porte Facility PO Box 687 La Porte, TX 77571	Corrective Action = \$4,250,000
TXR000057414	The Dow Chemical Company Clear Lake Operations 9502B Bayport Boulevard Pasadena, TX 77507	Closure = \$939,685
<u>REGION 9</u>		
CAD076528678	The Dow Chemical Company Pittsburg Plant PO Box 1398 Pittsburg, CA 94565	Closure = \$2,765,400 Postclosure = \$1,834,757 Corrective Action = \$59,283,625 Groundwater Treatment Plant Closure = \$152,162
CAD009547050	The Dow Chemical Company Torrance Plant 305 Crenshaw Torrance, CA 90503	Closure = \$472,215

4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanisms specified in subpart H of 40 CFR parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

None.

5. This firm is the owner or operator or guarantor of the following UIC facilities for which financial assurance for plugging and abandonment is required under part 144 and is assured through a financial test. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility:

REGION 6

ARD982286874	The Dow Chemical Company Highway 371 Magnolia, AR 71753	Plugging & Abandonment = \$514,650
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LAD020597597

Angus Chemical Company
Sterlington Facility
PO Box 1325
Sterlington, LA 71280

Plugging & Abandonment
= \$234,925

This firm is required to file a Form 10K with the securities and exchange commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 2006.


Part B. Closure or Post-Closure Care and Liability Coverage

ALTERNATIVE II

- | | | | |
|------|--|-------------------|-----------|
| 1. | Sum of current closure and post-closure cost estimates (total of all cost estimates listed above) | \$372,559,558 | |
| 2. | Amount of annual aggregate liability coverage to be demonstrated | \$8,000,000 | |
| 3. | Sum of lines 1 and 2 | \$380,559,558 | |
| 4. | Current bond rating of most recent issuance and name of rating Service | A- (S&P) | |
| 5. | Date of issuance of bond | November 22, 2002 | |
| 6. | Date of maturity of bond | November 15, 2007 | |
| *7. | Tangible net worth (if any portion of the closure or post-closure cost estimates is included in the "total liabilities" on your financial statements, you may add that portion to this line) | \$13,366,000,000 | |
| *8. | Total assets in U.S. (required only if less than 90% of assets are located in the U.S.) | \$22,672,000,000 | |
| | | <u>YES</u> | <u>NO</u> |
| 9. | Is line 7 at least \$10 million? | X | |
| 10. | Is line 7 at least 6 times line 3? | X | |
| *11. | Are at least 90% of assets located in the U.S.? If not, complete line 12. | | X |
| 12. | Is line 8 at least 6 times line 3? | X | |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

RWC/mro


Geoffery E. Merszei
Executive Vice President
and Chief Financial Officer
The Dow Chemical Company

March 26, 2007

cc: Gale Bradley, The Dow Chemical Company, Hanging Rock Plant, Ironton, OH
Michele Osmun, The Dow Chemical Company, 2030 Dow Center, Midland, MI 48674

NOTE: Please direct all correspondence related to this letter to Michele Osmun, 2030 Dow Center, Midland, MI 48674. Phone (989) 636-5581 or Fax (989) 638-9636.

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To the Board of Directors
The Dow Chemical Company
Midland, Michigan

We have performed the procedures included in the Code of Federal Regulations ("CFR"), Title 40, Part 264, Section 143 (40 CFR 264.143), which were agreed to by the U.S. Environmental Protection Agency – Region 5 – Regional Administrator and The Dow Chemical Company ("Dow"), solely to assist the specified parties in evaluating Dow's compliance with the financial test option as of December 31, 2006, included in the accompanying letter dated March 26, 2007 from Mr. Geoffery E. Merszei of Dow. Management is responsible for Dow's compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of the parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures that we performed and related findings are as follows:

We recomputed from, or reconciled to, the audited consolidated financial statements of Dow as of and for the year ended December 31, 2006, on which we have issued our report dated February 14, 2007 (which report expresses an unqualified opinion and includes an explanatory paragraph relating to a change in the method of accounting for defined benefit pension and other postretirement plans to conform to Statement of Financial Accounting Standards No. 158) the information included in Items 7, 8 and 11 under the caption Alternative II in the Letter referred to above and noted no differences.

We were not engaged to, and did not, perform an examination, the objective of which would be the expression of an opinion on the accompanying letter dated March 26, 2007. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the board of directors and management of Dow and the specified parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than these specified parties.

Deloitte & Touche LLP

March 26, 2007



The Dow Chemical Company

Midland, Michigan 48674

March 31, 1993

Director
State of Ohio Environmental Protection Agency
P. O. Box 1049
1800 WaterMark Drive
Columbus, OH 43266-1049

Dear Sir/Madam:

I am the chief financial officer of The Dow Chemical Company, 2030 Dow Center, Midland, MI 48674. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Chapters 3745-55 and 3745-66 of the Administrative Code.

1. The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and nonsudden accidental occurrences is being demonstrated through the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code:

<u>EPA I.D. #</u> <u>& OHIO PERMIT #</u>	<u>NAME</u>	<u>ADDRESS</u>
OHD039128913	The Dow Chemical Co. Hanging Rock Plant	Old 52 Highway Ironton, OH 45638
OHD081287294	The Dow Chemical Co. Granville R&D	PO Box 515 Granville, OH 43023

2. The firm identified above guarantees, through the corporate guarantee specified in Rules 3745-55-40 through 3745-55-51 and 3745-66-40 through 3745-66-48 of the Administrative Code, liability coverage for both sudden and nonsudden accidental occurrences at the following facilities owned or operated by the following subsidiaries of the firm:

None.

3. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Chapters 3745-55 or 3145-66 of the Administrative Code. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

EPA I.D. #
& OHIO PERMIT #

NAME

ADDRESS

OHD039128913

The Dow Chemical Co.
Hanging Rock Plant

Old 52 Highway
Ironton, OH 45638

OHD081287294

The Dow Chemical Co.
Granville R&D

PO Box 515
Granville, OH 43023

4. The firm identified above guarantees, through the corporate guarantee specified in Chapters 3745-55 and 3745-66 of the Administrative Code, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimate for the closure or post-closure care so guaranteed are shown for each facility:

None.

5. The firm identified above is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

Region I

CT001159730

The Dow Chemical Co.
Allyn's Point

Route 12
Gales Ferry, CT 06335

Closure = \$129,521

Region IV

GAD045929643

The Dow Chemical Co.
Dalton Plant

1468 Prosser Dr., SE
Dalton, GA 30720

Closure = \$8,924

Region V

OHD039128913

The Dow Chemical Co.
Hanging Rock Plant

Old 52 Highway
Ironton, OH 45638

Closure = \$99,273

ILD09315499

The Dow Chemical Co.
Joliet Plant

PO Box 368
Joliet, IL 60434

Closure = \$175,970

MID000724724

The Dow Chemical Co.
MI Division/Midland Plant

1261 Building
Midland, MI 48674

Closure = \$85,987,047
Post-Closure = \$1,017,000

MID980617435

The Dow Chemical Co.
MI Division/Salzburg Plant

Salzburg & Waldo Roads
Midland, MI 48640

Closure = \$1,280,880
Post-Closure = \$1,170,454

Region VI

ARD051965416

The Dow Chemical Co.
Russellville Plant

PO Box 1048
Russellville, AR 72801

Closure = \$56,536

LAD008187080

The Dow Chemical Co.
Louisiana Division

PO Box 150
Plaquemine, LA 70764

Closure = \$3,171,782
Post-Closure = 379,085

TXD00017756

The Dow Chemical Co.
LaPorte Facility

PO Box 687
LaPorte, TX 77571

Closure = \$759,404
Post-Closure = \$5,590,121

TXD008092793

The Dow Chemical Co.
Texas Operations

B-1226
Freeport, TX 77541

Closure = \$61,408,200
Post-Closure = \$10,246,800

Region VII

MOD001829852

The Dow Chemical Co.
Riverside Plant

PO Box 387
Pevely, MO 63070

Closure = \$192,317

Region IX

CAD009547050

The Dow Chemical Co.
Torrance Plant

305 Crenshaw Blvd.
Torrance, CA 90503

Closure Cost = \$289,910

CAD076528678

The Dow Chemical Co.
Pittsburg Plant

PO Box 1398
Pittsburg, CA 94565

Closure Cost = \$4,336,209

Post-Closure = \$12,203,216

6. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated to the director through the financial test or any other financial assurance mechanism specified in Chapters 3745-55 or 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

None.

7. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under Chapters 3745-34 of the Administrative Code. The current closure cost estimates as required by Chapters 3745-34, 3745-55 and 3745-66 of the Administrative Code are shown for each facility:

None.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31st. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1992.

Part B. Closure or Post-Closure Care and Liability Coverage

ALTERNATIVE II

(In Millions of Dollars)

- | | | |
|-----|--|-------------------|
| 1. | Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed above). | <u>\$ 189</u> |
| 2. | Amount of annual aggregate liability coverage to be demonstrated. | <u>\$ 8</u> |
| 3. | Sum of lines 1 and 2 | <u>\$ 197</u> |
| 4. | Current bond rating of most recent issuance and name of rating service. | <u>A1 - Moody</u> |
| 5. | Date of issuance of bond. | <u>02/24/1993</u> |
| 6. | Date of maturity of bond. | <u>03/01/2023</u> |
| *7. | Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line). | <u>\$ 3,035</u> |
| *8. | Total assets in U.S. (required only if less than 90% of assets are located in the U.S.). | <u>\$14,551</u> |



The Dow Chemical Company

Midland, Michigan 48674

2030 Willard H. Dow Center
March 31, 1992

Director
State of Ohio Environmental Protection Agency
P. O. Box 1049
1800 WaterMark Drive
Columbus, OH 43266-0149

Dear Sir/Madam:

I am the chief financial officer of The Dow Chemical Company, 2030 WHDC, Midland, MI 48674. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Chapters 3745-55 and 3745-66 of the Administrative Code.

1. The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and nonsudden accidental occurrences is being demonstrated through the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code:

EPA I.D. #
& OHIO PERMIT #

NAME

ADDRESS

OHD039128913

The Dow Chemical Co.
Hanging Rock Plant

Old 52 Highway
Ironton, OH 45638

OHD081287294

The Dow Chemical Co.
Granville R&D

P. O. Box 515
Granville, OH 43023

EPA I.D. #
& OHIO PERMIT #

NAME

ADDRESS

CTD001159730

The Dow Chemical Co.
Allyn's Point Plant

Route 12
Gales Ferry, CT 06335

Closure Cost = \$121,852

Region IV

GAD045929643

The Dow Chemical Co.
Dalton Plant

1468 Prosser Drive, S.E.
Dalton, GA 30720

Closure Cost = \$8,698

Region V

ILD093154599

The Dow Chemical Co.
Joliet Plant

P. O. Box 368
Joliet, IL 60434

Closure Cost = \$161,565

MID000724724

The Dow Chemical Co.
Michigan Division
Midland Plant

628 Bldg.
Midland, MI 48640

Closure Cost = \$72,997,035

Post-Closure Cost = \$907,901

MID980617435

The Dow Chemical Co.
Michigan Division
Salzburg Landfill

Salzburg & Waldo Roads
Midland, MI 48640

Closure Cost = \$1,248,421

Post-Closure Cost = \$1,140,793

EPA I.D. #
& OHIO PERMIT #

CAD076528678

Closure Cost = \$289,910

NAME

ADDRESS

The Dow Chemical Co.
Pittsburg Plant

P. O. Box 1398
Pittsburg, CA 94565

Closure Cost = \$3,392,240

Post-Closure Cost = \$11,893,973

6. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated to the director through the financial test or any other financial assurance mechanism specified in Chapters 3745-55 or 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

None.

7. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under Chapters 3745-34 of the Administrative Code. The current closure cost estimates as required by Chapters 3745-34, 3745-55 and 3745-66 of the Administrative Code are shown for each facility:

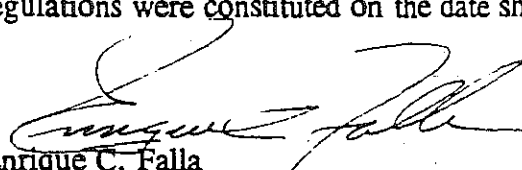
None.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.


The fiscal year of this firm ends on December 31st. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1991.

	YES	NO
12. Is line 5 at least \$10 million?	<u>X</u>	—
13. Is line 5 at least 6 times line 3?	<u>X</u>	—
14. Is line 9 at least 6 times line 3?	<u>X</u>	—
*15. Are at least 90% of assets located in the U.S.? If not, complete line 16	—	<u>X</u>
16. Is line 11 at least 6 times line 3?	<u>X</u>	—
17. Is line 4 divided by line 6 less than 2.0?	<u>X</u>	—
18. Is line 10 divided by line 4 greater than 0.1?	<u>X</u>	—
19. Is line 7 divided by line 8 greater than 1.5?	—	<u>X</u>

I hereby certify that the wording of this letter is substantially identical to the wording specified in paragraph (G) of rule 3745-55-51 of the Administrative Code as such regulations were constituted on the date shown immediately below.


 Enrique C. Falla
 Financial Vice President and
 Chief Financial Officer
 The Dow Chemical Company

March 31, 1992


 SIH/sso



The Dow Chemical Company

Midland, Michigan 48674

2030 Dow Center
March 31, 1991

Ms. Carolyn Reiersen
Hazardous Waste/Enf. Section
Ohio EPA
P.O. Box 1049
1800 WaterMark Drive
Columbus, OH 43266-1049

Ms. Reiersen:

Enclosed is the Financial Assurance for liability coverage and closure and post-closure care.

Also enclosed are the 1990 Annual Reports, 10-K Forms, and Annual Meeting of Stockholders.

If you have any questions or concerns regarding the attached documents, please do not hesitate to call me.

A handwritten signature in cursive script, reading "S. I. Houseal".

Stephen I. Houseal
Legal Department
517/636-8180

sg

Enclosure



The Dow Chemical Company

Midland, Michigan 48674

2030 Willard H. Dow Center
March 31, 1991

Director
State of Ohio Environmental Protection Agency
P. O. Box 1049
1800 WaterMark Drive
Columbus, OH 43266-0149

Dear Sir/Madam:

I am the chief financial officer of The Dow Chemical Company, 2030 WHDC, Midland, MI 48674. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Chapters 3745-55 and 3745-66 of the Administrative Code.

1. The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and nonsudden accidental occurrences is being demonstrated through the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code:

<u>EPA I.D. #</u> <u>AND OHIO PERMIT #</u>	<u>NAME</u>	<u>ADDRESS</u>
OHD039128913	The Dow Chemical Co. Hanging Rock Plant	Old 52 Highway Ironton, OH 45638
OHD081287294	The Dow Chemical Co. Granville R&D	P. O. Box 515 Granville, OH 43023

2. The firm identified above guarantees, through the corporate guarantee specified in Rules 3745-55-40 through 3745-55-51 and 3745-66-40 through 3745-66-48 of the Administrative Code, liability coverage for both sudden and nonsudden accidental occurrences at the following facilities owned or operated by the following subsidiaries of the firm:

None.

3. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Chapters 3745-55 or 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

<u>EPA I.D. #</u> <u>AND OHIO PERMIT #</u>	<u>NAME</u>	<u>ADDRESS</u>
OHD039128913	The Dow Chemical Co. Hanging Rock Plant	Old 52 Highway Irononton, OH 45638
	Closure Cost = \$15,000	
OHD081287294	The Dow Chemical Co. Granville R&D	P. O. Box 515 Granville, OH 43023
	Closure Cost = \$18,057	

4. The firm identified above guarantees, through the corporate guarantee specified in Chapters 3745-55 and 3745-66 of the Administrative Code, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimate for the closure or post-closure care so guaranteed are shown for each facility:

None.

5. The firm identified above is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

<u>EPA I.D. #</u> <u>AND OHIO PERMIT #</u>	<u>NAME</u>	<u>ADDRESS</u>
CTD001159730	The Dow Chemical Co. Allyn's Point Plant	Route 12 Gales Ferry, CT 06335
	Closure Cost = \$112,414	

Region IV

GAD045929643	The Dow Chemical Co. Dalton Plant	1468 Prosser Drive, S.E. Dalton, GA 30720
	Closure Cost = \$8,396	

EPA I.D. #
AND OHIO PERMIT #

NAME

ADDRESS

Region V

ILD093154599

The Dow Chemical Co.
Joliet Plant

P. O. Box 368
Joliet, IL 60434

Closure Cost = \$155,951

MID000724724

The Dow Chemical Co.
Michigan Division
Midland Plant

628 Bldg.
Midland, MI 48640

Closure Cost = \$70,884,051
Post-Closure Cost = \$876,352

MID980617435

The Dow Chemical Co.
Michigan Division
Salzburg Landfill

Salzburg & Waldo Roads
Midland, MI 48640

Closure Cost = \$1,205,040
Post-Closure Cost = \$1,101,152

Region VI

ARD051965416

The Dow Chemical Co.
Russellville Plant

P. O. Box 1048
Russellville, AR 72801

Closure Cost = \$41,051

LAD008187080

The Dow Chemical Co.
Louisiana Division

P. O. Box 150
Plaquemine, LA 70764

Closure Cost = \$2,841,901
Post-Closure Cost = \$371,887

TXD000017756

The Dow Chemical Co.
LaPorte Facility

P. O. Box 687
LaPorte, TX 77571

Closure Cost = \$714,440
Post-Closure Cost = 5,259,132

TXD008092793

The Dow Chemical Co.
Texas Operations

B-1226
Freeport, TX 77541

Closure Cost = \$47,930,400
Post-Closure Cost = \$9,838,200

EPA I.D. #
AND OHIO PERMIT #

NAME

ADDRESS

Region VII

MOD001829852

The Dow Chemical Co.
Riverside Plant

P. O. Box 387
Pevely, MO 63070

Closure Cost = \$132,199

Region IX

CAD009547050

The Dow Chemical Co.
Torrance Plant

305 Crenshaw Blvd.
Torrance, CA 90503

Closure Cost = \$208,200

CAD076528678

The Dow Chemical Co.
Pittsburg Plant

P. O. Box 1398
Pittsburg, CA 94565

Closure Cost = \$2,407,833

Post-Closure Cost = \$11,971,500

6. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated to the director through the financial test or any other financial assurance mechanism specified in Chapters 3745-55 or 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

None.

7. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under Chapters 3745-34 of the Administrative Code. The current closure cost estimates as required by Chapters 3745-34, 3745-55 and 3745-66 of the Administrative Code are shown for each facility:

None.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31st. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1990.

Part B. Closure or Post-Closure Care and Liability Coverage

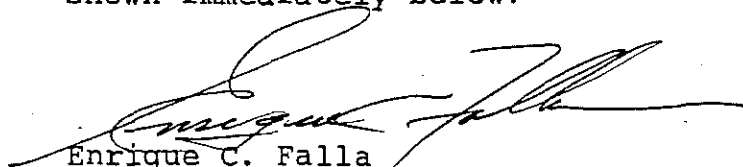
ALTERNATIVE I

(In Millions of Dollars)


1.	Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	\$ <u>156</u>
2.	Amount of annual aggregate liability coverage to be demonstrated (Sudden: \$2M; Non-Sudden: \$6M)	\$ <u>8</u>
3.	Sum of lines 1 and 2	\$ <u>164</u>
*4.	Total liabilities (If any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6)	\$ <u>12,985</u>
*5.	Tangible net worth	\$ <u>3,954</u>
*6.	Net worth	\$ <u>8,728</u>
*7.	Current assets	\$ <u>8,019</u>
*8.	Current liabilities	\$ <u>5,754</u>
9.	Net working capital (line 7 minus line 8)	\$ <u>2,265</u>
*10.	The sum of net income available for common stockholders, plus depreciation, depletion, and amortization	\$ <u>2,674</u>
*11.	Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)	\$ <u>13,074</u>

		YES	NO
12.	Is line 5 at least \$10 million?	<u>X</u>	<u> </u>
13.	Is line 5 at least 6 times line 3?	<u>X</u>	<u> </u>
14.	Is line 9 at least 6 times line 3?	<u>X</u>	<u> </u>
*15.	Are at least 90% of assets located in the U.S.? If not, complete line 16	<u> </u>	<u>X</u>
16.	Is line 11 at least 6 times line 3?	<u>X</u>	<u> </u>
17.	Is line 4 divided by line 6 less than 2.0?	<u>X</u>	<u> </u>
18.	Is line 10 divided by line 4 greater than 0.1?	<u>X</u>	<u> </u>
19.	Is line 7 divided by line 8 greater than 1.5?	<u> </u>	<u>X</u>

I hereby certify that the wording of this letter is substantially identical to the wording specified in paragraph (G) of rule 3745-55-51 of the Administrative Code as such regulations were constituted on the date shown immediately below.


 Enrique C. Falla
 Financial Vice President and
 Chief Financial Officer
 The Dow Chemical Company

March 31, 1991

 SIH/ssg

Deloitte & Touche



325 East Main Street
P.O. Box 648
Midland, Michigan 48640-0648
Telephone: (517) 832-9536, 631-2370

ITT Telex: 4995272
Facsimile: (517) 793-6121

March 31, 1991

The Dow Chemical Company
Midland, Michigan

We have audited, in accordance with generally accepted auditing standards, the consolidated financial statements of The Dow Chemical Company and its subsidiaries for the year ended December 31, 1990 and have issued our report thereon dated February 13, 1991. We have not performed any auditing procedures beyond the date of our report on the consolidated financial statements; accordingly, this report is based on our knowledge as of that date and should be read with that understanding.

At your request, we have performed the procedures enumerated below with respect to the accompanying letter from Mr. Enrique C. Falla to the State of Ohio Environmental Protection Agency dated March 31, 1991. It is understood that this report is solely for filing with the Division of Solid and Hazardous Waste Management in accordance with requirements of the Ohio Administrative Code and is not to be used for any other purpose. The procedures that we performed are summarized as follows:

1. We compared the amounts included in items 6, 7, 8 and 11 under the caption Alternative I (Part B) in the letter referred to above with the corresponding amounts in the financial statements referred to in the first paragraph.
2. We recomputed from, or reconciled to, the financial statements referred to in the first paragraph the information included in items 4, 5, 10 and 15 under the caption Alternative I (Part B) in the letter referred to above.

Because the procedures referred to in the preceding paragraph were not sufficient to constitute an audit made in accordance with generally accepted auditing standards, we do not express an opinion on any of the information or amounts listed under the caption Alternative I (Part B) in the aforementioned letter. In performing the procedures referred to above, however, no matters came to our attention that caused us to believe that the information or amounts included in items 4, 5, 6, 7, 8, 10, 11 and 15 should be adjusted.

Deloitte & Touche



THE DOW CHEMICAL COMPANY

WILLARD H. DOW CENTER
MIDLAND, MICHIGAN 48674

2030 Willard H. Dow Center
April 28, 1986

SEE: OHD-004-254-702
for additional

RECEIVED *document*

MAY 1 1986

U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

Mr. Valdas Adamkus
Regional Administrator, Region V
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Adamkus:

Attached is the documentation in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

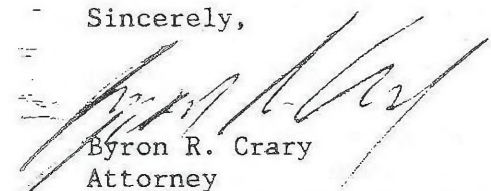
These documents reflect several changes from our prior submission due to the following recent events:

- 1) The incorporation of the Health and Consumer Products Department as Dow Consumer Products, Inc., a subsidiary of The Dow Chemical Company;
- 2) The merging of the Oyster Creek Division into Texas Operations; and
- 3) The revision of closure and post-closure cost estimates, due to changes in unit operations within the facilities and to new regulatory requirements. These are denoted by an asterisk (*) in the letter from Mr. Falla.

Any questions concerning the attached documents should be directed to:

Byron R. Crary
2030 Willard H. Dow Center
Midland, MI 48674
(517) 636-2638

Sincerely,


Byron R. Crary
Attorney
Environmental Law Section
Legal Department

Attachments

O. WMD
CC: RF(CERT)



THE DOW CHEMICAL COMPANY

2030 Willard H. Dow Center
September 30, 1985

THE DOW CENTER
MIDLAND, MICHIGAN 48640

RECEIVED

Mr. Valdas Adamkus
Regional Administrator, Region V
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

OCT 3 1985

EPA REGION 5
OFFICE OF REGIONAL
ADMINISTRATION

Dear Mr. Adamkus:

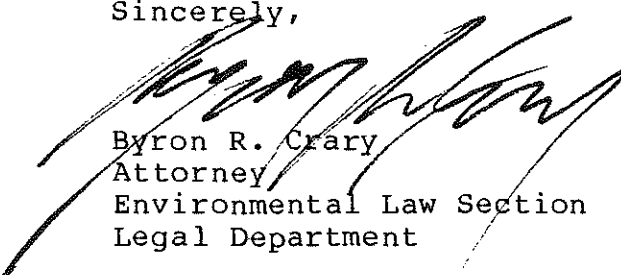
Attached is the documentation in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

These documents reflect the changes caused by Dow's recent acquisition of facilities from the Upjohn Company.

Any questions concerning the attached documents should be directed to:

Byron R. Crary
2030 Willard H. Dow Center
Midland, MI 48674
(517) 636-2638

Sincerely,



Byron R. Crary
Attorney
Environmental Law Section
Legal Department

Attachments

RECEIVED

OCT 07 1985

SOLID WASTE BRANCH
U.S. EPA, REGION V

O. WMD
cc RF
Canadian
RC



THE DOW CHEMICAL COMPANY

THE DOW CENTER
MIDLAND, MICHIGAN 48640

2030 Willard H. Dow Center
September 30, 1985

Mr. Valdas Adamkus
Regional Administrator, Region V
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Adamkus:

I am the Chief Financial Officer of The Dow Chemical Company. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

<u>EPA I.D. #</u>	<u>NAME</u>	<u>ADDRESS</u>
<u>Region I</u>		
CTD001159730	The Dow Chemical Co. Allyn's Point Plant	Route 12 Gales Ferry, CT 06335
CTD000635896	The Dow Chemical Co. D.S. Gilmore Lab.	410 Sackett Point Rd. North Haven, CT 06473
<u>Region IV</u>		
GAD045929643	The Dow Chemical Co. Dalton Plant	1468 Prosser Drive, S.E. Dalton, GA 30720
<u>Region V</u>		
OHD005053624	The Dow Chemical Co. Findlay Plant	P.O. Box 708 Findlay, OH 45840

September 30, 1985
Page Two

<u>EPA I.D. #</u>	<u>NAME</u>	<u>ADDRESS</u>
OHD039128913	The Dow Chemical Co. Hanging Rock Plant	Old 52 Highway Ironton, OH 45638
OHD081287294	The Dow Chemical Co. Granville R&D	P.O. Box 515 Granville, OH 43023
OHD004254702	Merrell Dow Pharmaceu- ticals Inc.	2110 Galbraith Rd. Cincinnati, OH 45215
IND000195545	Health and Consumer Products Department Dow Chemical Co.	5859 W. 96 Street Indianapolis, IN 46268
ILD093154599	The Dow Chemical Co. Joliet Plant	P.O. Box 368 Joliet, IL 60434
MID006016919	The Dow Chemical Co. Ludington Plant	S. Madison and Seventh Ludington, MI 49431
MID000724724	Michigan Division Midland Plant	628 Bldg Dow Chemical Co. Midland, MI 48640
MID980617435	Michigan Division Salzburg Landfill	Salzburg & Waldo Roads Midland, MI 48640

Region VI

ARD041580762	The Dow Chemical Co. Magnolia Plant	P.O. Box 520 Magnolia, AR 71753
ARD051965416	The Dow Chemical Co. Russellville Plant	P.O. Box 1048 Russellville, AR 72801
LAD008187080	The Dow Chemical Co. Louisiana Division	P.O. Box 150 Plaquemine, LA 70764
TXD000017756	The Dow Chemical Co. LaPorte Facility	P.O. Box 687 LaPorte, TX 77571
TXD000803270	The Dow Chemical Co. Oyster Creek Division	P.O. Box BB Freeport, TX 77541
TXD008092793	The Dow Chemical Co. Texas Operations	B-1226 Freeport, TX 77541

September 30, 1985
Page Three

<u>EPA I.D. #</u>	<u>NAME</u>	<u>ADDRESS</u>
<u>Region VII</u>		
MOD001829852	The Dow Chemical Co. Riverside Plant	P.O. Box 387 Pevely, MO 63070

Region IX

CAD990862864	The Dow Chemical Co. Alaska Avenue Facility	530 Alaska Ave. Torrance, CA 90503
CAD009547050	The Dow Chemical Co. Torrance Plant	305 Crenshaw Blvd. Torrance, CA 90503
CAD076528678	The Dow Chemical Co. Pittsburg Plant	P.O. Box 1398 Pittsburg, CA 94565

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

MID006016919	The Dow Chemical Co. Ludington Plant	S. Madison and Seventh Ludington, MI 49431
--------------	---	---

** Closure Cost = \$2,834

MID000724724	Michigan Division Midland Plant	628 Bldg Dow Chemical Co. Midland, MI 48640
--------------	------------------------------------	--

** Closure Cost = \$37,452,305
Post-Closure Cost = \$15,321,230

MID980617435	Michigan Division Salzburg Landfill	Salzburg & Waldo Roads Midland, MI 48640
--------------	--	---

** Closure Cost = \$985,450
Post-Closure Cost = \$868,800

** All Michigan Cost Estimates are based on the requirement of Michigan Public Act 64.

September 30, 1985

Page Four

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

None

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

EPA I.D. #

NAME

ADDRESS

Region I

CTD001159730

The Dow Chemical Co.
Allyn's Point Plant

Route 12
Gales Ferry, CT 06335

Closure Cost = \$22,392

CTD000635896

The Dow Chemical Co.
D.S. Gilmore Lab.

410 Sackett Point
North Haven, CT 06473

Closure Cost = \$11,837

Region IV

GAD045929643

The Dow Chemical Co.
Dalton Plant

1468 Prosser Drive, S.E.
Dalton, GA 30720

Closure Cost = \$7,266

September 30, 1985
Page Five

<u>EPA I.D. #</u>	<u>NAME</u>	<u>ADDRESS</u>
<u>Region V</u>		
OHD004254702	Merrell Dow Pharmaceuti- cals Inc.	2110 E. Galbraith Rd. Cincinnati, OH 45215
	Closure Cost = \$62,365	
OHD005053624	The Dow Chemical Co. Findlay Plant	P.O. Box 708 Findlay, OH 45840
	Closure Cost = \$40,212	
OHD039128913	The Dow Chemical Co. Hanging Rock Plant	Old 52 Highway Ironton, OH 45638
	Closure Cost = \$21,885	
OHD081287294	The Dow Chemical Co. Granville R&D	P.O. Box 515 Granville, OH 43023
	Closure Cost = \$4,318	
ILD093154599	The Dow Chemical Co. Joliet Plant	P.O. Box 368 Joliet, IL 60434
	Closure Cost = \$64,460	
IND000195545	Health and Consumer Products Department Dow Chemical Co.	5859 W. 96 Street Indianapolis, IN 46268
	Closure Cost = \$66,064	

Region VI

ARD041580762	The Dow Chemical Co. Magnolia Plant	P.O. Box 520 Magnolia, AR 71753
	Closure Cost = \$65,110	

<u>EPA I.D. #</u>	<u>NAME</u>	<u>ADDRESS</u>
<u>Region VI (Cont.)</u>		
ARD051965416	The Dow Chemical Co. Russellville Plant	P.O. Box 1048 Russellville, AR 72801
	Closure Cost = \$12,485	
LAD008187080	The Dow Chemical Co. Louisiana Division	P.O. Box 150 Plaquemine, LA 70764
	Closure Cost = \$2,249,020 Post-Closure Cost = \$247,000	
TXD000017756	The Dow Chemical Co. LaPorte Facility	P. O. Box 687 LaPorte, TX 77571
	Closure Cost = \$3,715,300 Post-Closure Cost = \$15,356,000	
TXD000803270	The Dow Chemical Co. Oyster Creek Division	P.O. Box BB Freeport, TX 77541
	Closure Cost = \$875,651 Post-Closure Cost = \$201,677	
TXD008092793	The Dow Chemical Co. Texas Operations	B-1226 Freeport, TX 77541
	Closure Cost = \$2,833,997 Post-Closure Cost = \$367,058	

Region VII

MOD001829852	The Dow Chemical Co. Riverside Plant	P.O. Box 387 Pevely, MO 63070
	Closure Cost = \$63,051	

September 30, 1985
Page Seven

<u>EPA I.D. #</u>	<u>NAME</u>	<u>ADDRESS</u>
<u>Region IX</u>		
CAD990862864	The Dow Chemical Co. Alaska Avenue Facility	530 Alaska Ave. Torrance, CA 90503
	Closure Cost = \$1600	
CAD009547050	The Dow Chemical Co. Torrance Plant	305 Crenshaw Blvd. Torrance, CA 90503
	Closure Cost = \$115,500	
CAD076528678	The Dow Chemical Co. Pittsburg Plant	P.O. Box 1398 Pittsburg, CA 94565
	Closure Cost = \$6,702,700 Post-Closure Cost = \$1,498,200	

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

None

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited year-end financial statements for the latest completed fiscal year, ended December 31, 1984.

ALTERNATIVE I (Part B)

(In Millions of Dollars)

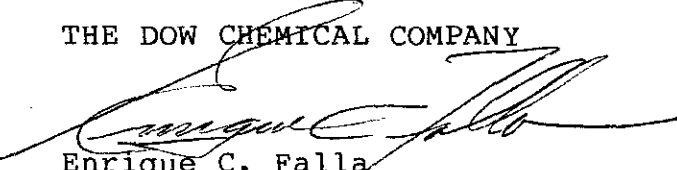
†1.	Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	\$ <u>89.3</u>
†2.	Amount of annual aggregate liability coverage to be demonstrated (Sudden: \$2M; Non-Sudden: \$6M)	\$ <u>8.0</u>
†3.	Sum of lines 1 and 2	\$ <u>97.3</u>
† Not covered by auditor's report.		
*4.	Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6)	\$ <u>6,357</u>
*5.	Tangible net worth	\$ <u>4,829</u>
*6.	Net worth	\$ <u>5,062</u>
*7.	Current assets	\$ <u>3,931</u>
*8.	Current liabilities	\$ <u>2,676</u>
9.	Net working capital (line 7 minus line 8)	\$ <u>1,255</u>
*10.	The sum of net income plus depreciation, depletion, and amortization	\$ <u>1,493</u>
*11.	Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)	\$ <u>6,073</u>


September 30, 1985
Page Nine

	Yes	No
12. Is line 5 at least \$10 million?	<u>X</u>	<u> </u>
13. Is line 5 at least 6 times line 3?	<u>X</u>	<u> </u>
14. Is line 9 at least 6 times line 3?	<u>X</u>	<u> </u>
*15. Are at least 90% of assets located in the U.S.? If not, complete line 16	<u> </u>	<u>X</u>
16. Is line 11 at least 6 times line 3?	<u>X</u>	<u> </u>
17. Is line 4 divided by line 6 less than 2.0?	<u>X</u>	<u> </u>
18. Is line 10 divided by line 4 greater than 0.1?	<u>X</u>	<u> </u>
19. Is line 7 divided by line 8 greater than 1.5?	<u> </u>	<u>X</u>

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

THE DOW CHEMICAL COMPANY


Enrique C. Falla
Financial Vice President

BRC/mle 

Responsibility for Financial Statements

The following consolidated financial statements and related notes of The Dow Chemical Company and its subsidiaries were prepared by management in accordance with generally accepted accounting principles. The Board of Directors, through its Audit Committee, assumes an oversight role with respect to the preparation of the financial statements.

The Company is responsible for the integrity and objectivity of the consolidated financial statements, which are presented in a consistent manner on the accrual basis of accounting. Established accounting procedures are designed to provide accurate books, records and accounts, which fairly reflect the transactions of the Company.

The training of qualified personnel and the assignment of duties are intended to provide internal controls at a cost appropriate to management's evaluation of the risks involved. Such controls are monitored by an internal audit staff, providing reasonable assurances that transactions are executed in accordance with management's authorization and that adequate accountability for the Company's assets is maintained.

Deloitte Haskins & Sells, independent public accountants, with direct access to the Board of Directors through its Audit Committee, have examined the consolidated financial statements prepared by the Company, and their report follows.

Opinion of Independent Public Accountants

*To the Stockholders and Board of Directors
of The Dow Chemical Company*

We have examined the consolidated balance sheets of The Dow Chemical Company and its subsidiaries as of December 31, 1984 and 1983 and the related consolidated statements of income, stockholders' equity and changes in financial position for each of the three years in the period ended December 31, 1984. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing

procedures as we considered necessary in the circumstances.

In our opinion, such financial statements present fairly the financial position of The Dow Chemical Company and its subsidiaries at December 31, 1984 and 1983 and the results of their operations and the changes in their financial position for each of the three years in the period ended December 31, 1984, in conformity with generally accepted accounting principles applied on a consistent basis.

Deloitte Haskins & Sells

Midland, Michigan
February 15, 1985

Deloitte Haskins + Sells

333 East Main Street
Post Office Box 312
Midland, Michigan 48640
(517) 832-9536, 631-2370
ITT Telex: 4995272

The Dow Chemical Company
Midland, Michigan

September 30, 1985

Dear Sirs:

We have examined the consolidated financial statements of The Dow Chemical Company and its subsidiaries for the year ended December 31, 1984 and have expressed our opinion thereon dated February 15, 1985. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. We have not performed any auditing procedures beyond the date of our opinion on the financial statements; accordingly, this report is based on our knowledge as of that date and should be read with that understanding.

At your request we have performed the procedures enumerated below with respect to the accompanying letter from Mr. Enrique C. Falla to the Regional Administrator - Environmental Protection Agency dated September 30, 1985. It is understood that this report is solely for filing with the Environmental Protection Agency in accordance with requirements of the Resource Conservation and Recovery Act and is not to be used for any other purpose. The procedures that we performed are summarized as follows:

1. We compared the amounts included in items 6, 7, 8, and 11 under the caption Alternative I (Part B) in the letter referred to above with the corresponding amounts in the financial statements referred to in the first paragraph.
2. We recomputed from, or reconciled to, the financial statements referred to in the first paragraph the information included in items 4, 5, and 10 under the caption Alternative I (Part B) in the letter referred to above.

Because the procedures referred to in the preceding paragraph were not sufficient to constitute an examination in accordance with generally accepted auditing standards, we do not express an opinion on any of the information or amounts listed under the caption Alternative I (Part B) in the aforementioned letter. In performing the procedures referred to above, however, no matters came to our attention that caused us to believe that the information or amounts included in items 4, 5, 6, 7, 8, 10, and 11 should be adjusted.

Yours truly,

Deloitte Haskins & Sells



THE DOW CHEMICAL COMPANY

2030 Willard H. Dow Center
March 27, 1985

THE DOW CENTER
MIDLAND, MICHIGAN 48640

Mr. Valdas Adamkus
Regional Administrator, Region V
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

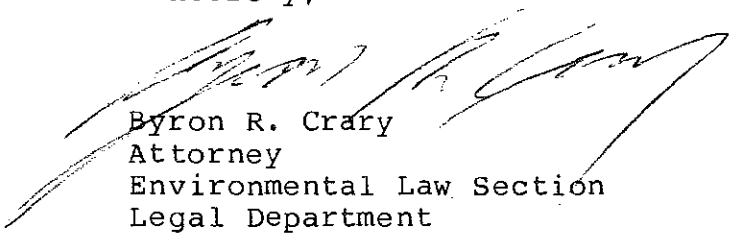
Dear Mr. Adamkus:

Attached is the documentation in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

Any questions concerning the attached documents should be directed to:

Byron R. Crary
2030 Dow Center
Midland, MI 48674
(517) 636-2638

Sincerely,



Byron R. Crary
Attorney
Environmental Law Section
Legal Department

Attachments

OHD 005 053 624
OHD 0039128 913

(see OHD 005 053 624
for document)

OHD 039 128913



THE DOW CHEMICAL COMPANY

April 14, 1983

BENNETT BUILDING
2030 DOW CENTER
MIDLAND, MICHIGAN 48640

*ADDITIONAL INFORMATION
IS FILED WITH
OHD 005 053 624*

Mr. Valdas Adamkus
Regional Administrator, Region V
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Adamkus:

Attached is the documentation in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

Sincerely,

R. Dean Cooper

R. D. Cooper
Attorney
Environmental Law Section
Legal Department

Attachments

RECEIVED
APR 15 1983

WASTE MANAGEMENT
BRANCH